

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION

JANE DOE,

Plaintiff,

v.

GLENN YATES,

Defendant.

Honorable

Case No.:

**PLAINTIFF JANE DOE'S MOTION FOR LEAVE  
TO PROCEED UNDER PSEUDONYM**

Plaintiff Jane Doe respectfully seeks leave from this Court to proceed under a pseudonym in this litigation. The factors set forth in *James v. Jacobson*, 6 F.3d 233 (4th Cir. 1993), weigh heavily in favor of permitting Ms. Doe to proceed under pseudonym. As set forth more fully in the accompanying Brief in Support of Plaintiff's Motion for Leave to Proceed Under Pseudonym, Ms. Doe states in support of her Motion:

1. Ms. Doe was just beginning her second semester of college at the University of Virginia when she suffered the sexual assault that forms the basis of her Complaint.
2. Plaintiff's claims involve matters of the utmost sensitivity. Ms. Doe was sexually abused and assaulted by fellow student Defendant Glenn Yates and the Complaint necessarily reveals intimate details of the horrors Ms. Doe suffered.
3. Plaintiff's claims are the result of significant mental, emotional and physical injuries sustained during the attack, including severe anxiety, nightmares, difficulty sleeping, and anorexia. Use of a pseudonym will enable Ms. Doe to present the specific details of her injuries and the continuing after-effects of the assault in an unfiltered and unambiguous manner.

4. Revealing her identity will subject Ms. Doe to significant risk of revictimization and further harm.

5. Ms. Doe, although not a minor, is a young adult attempting to complete her college education and begin her career.

6. Defendant will not face any unfair prejudice as a result of the Court allowing Ms. Doe to proceed under pseudonym, as Defendant is already fully aware of Ms. Doe's true identity, nor is Ms. Doe opposed to Defendant knowing her identity. Likewise, the public's interest in judicial openness, which will not be compromised if Ms. Doe is permitted to keep her name confidential, is outweighed by Ms. Doe's interest in anonymity.

WHEREFORE, Plaintiff requests that this Court grant her leave to proceed in this litigation using a pseudonym, barring the parties from filing information containing Plaintiff's un-redacted name or personally identifiable information, and granting to Plaintiff any and all other and further relief necessary to allow her to proceed under a pseudonym.

Respectfully Submitted,

Dated: January 12, 2022

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